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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF OREGON
PORTLAND DIVISION

MARCUS ESTES,
Plaintiff,
v.
METRC, INC., and METRC ID, LLC,
Defendants.

Case No. 3:25-cv-00556-IM

**DECLARATION OF MARCUS ESTES IN SUPPORT OF PLAINTIFF'S
RESPONSE TO DEFENDANTS' MOTION TO DISMISS**

I, MARCUS ESTES, declare and testify as follows:

1. I am over 18 years old. I am the Plaintiff in the above captioned case, and have personal knowledge of the facts set forth herein and make this declaration in support of Plaintiff's Response to Defendants' Motion to Dismiss.

2. After Metrc informed me I would be terminated, we engaged in negotiation over a severance agreement, and Metrc agreed to delay my termination until my stock options vested, or April 18, 2024. A true and correct copy of that correspondence is attached hereto as **Exhibit A**.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE UNITED STATES OF AMERICA AND THE STATE OF OREGON THAT THE FOREGOING IS TRUE AND CORRECT.

Dated: 5/23/2025

DocuSigned by:

By: 5AF4EB16E83C455...

Marcus Estes, *Declarant & Plaintiff*

Exhibit A

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

From: **Taylor Coffield** <taylor.coffield@metrc.com>

Date: Tue, Apr 2, 2024 at 10:36 PM

Subject: Re: Metrc Check-In

To: marcus estes <marcus.e@gmail.com>

Hi Marcus,

Sam confirmed that we updated your final date to align with your first vesting date - April 18th. If you want to exercise, you will have the ability.

Warmly,

Taylor Coffield

Icon Description automatically generated

Senior Director, People & Culture

m 404-723-8730

metrc.com

From: marcus estes <marcus.e@gmail.com>

Sent: Tuesday, April 2, 2024 10:56 AM

To: Taylor Coffield <taylor.coffield@metrc.com>

Subject: Re: Metrc Check-In

Exhibit A
Page 1 of 2

CAUTION: This email is from outside the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe. ***

Hi Taylor,

Thanks for the follow up. On our call Sam said he was getting me information on my stock options. Have you heard from him?

On Tue, Apr 2, 2024 at 6:47 AM Taylor Coffield <taylor.coffield@metrc.com> wrote:

Hi Marcus,

I am checking in to see if you have any additional questions or would like to discuss anything on a call. You asked about health insurance coverage. Not sure if you saw my response but I have included it below for your reference.

If enrolled in Metrc health insurance, you would have coverage until the end of April 30, 2024. Should you need health care coverage post that date, information on COBRA enrollment will be sent to you from Paylocity approximately 30 days post separation. If you enrolled, coverage would backdate.

Also, the Agreement is set to expire this Friday, April 5, 2024 and I wanted to make sure that you have all the information you need.

Warmly,

Taylor Coffield



Senior Director, People & Culture

m 404-723-8730

metrc.com

CERTIFICATE OF SERVICE

I hereby certify that on May 23, 2025, I served the foregoing DECLARATION OF MARCUS ESTES IN SUPPORT OF PLAINTIFF'S RESPONSE TO DEFENDANT'S MOTION TO DISMISS on the parties below:

[x] by emailing a true and correct copy to the last known email address of each person listed below;

[x] by electronic means through the Court's Case Management/Electronic Case File system, which will send automatic notification of filing to each person listed below.

OGLETREE, DEAKINS, NASH, SMOAK & STEWART, P.C.

Dougals Paul
503-552-2140
douglas.paul@ogletree.com

DATED: May 23, 2025

ANDREW DEWESE, PC

By: /s/ Andrew C. DeWeese
Andrew DeWeese, OSB 136332
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Portland, Oregon 97210
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Attorney for Plaintiff